

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER No. 95-141
SITE CLEANUP REQUIREMENTS FOR:

WACHOVIA REAL ESTATE FUND, AND
WACHOVIA BANK OF NORTH CAROLINA, N.A.
301 NORTH MAIN STREET
WINSTON-SALEM, NC 27150-3099

WACHOVIA REAL ESTATE FUND PROPERTY located at
26545-63 CORPORATE AVENUE
HAYWARD
ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Board), finds that:

1. **Site Location:** The site is located at 26545-26563 Corporate Avenue (hereinafter the Site) in the west Hayward, Alameda County. It covers an area of about 1.6 acres and is part of the Eden Rock Industrial Park which is a mixed-use office-industrial development constructed in the mid-1970s. Situated at the Site is a single-story building (hereinafter the Building) with total area of approximately 20,000 square-foot. North of the Site is a metals refinishing facility owned by Alumtreat. Bounded on the west and east is a vacant property owned by Pacific Gas & Electric (PG&E) and Corporate Avenue, respectively. Utah State Retirement Fund owns a property to the south of the Site. Lusk Metals operates a plastics and metal milling facility and warehouse on the next property to the south of Utah Fund's building. A surface water known as Eden Creek is about 3,000 feet to the west of the Site. The creek drains into the San Francisco Bay.
2. **Site History:** In mid-1970 before the Eden Rock Industrial Park was developed, the Site was part of salt-water marsh and agricultural land of the San Francisco Bay plain.. No surface structures were noted on and in the vicinity of the Site. The Site was developed in 1977. Former occupants of the Site include Xerox, South Bay CRT, Budget Furniture Rentals, and Bakery Specialty Products. Xerox used the Building for storage from 1977 to 1985. South Bay CRT, which re-manufactured cathode ray tubes, occupied the Building from 1984 to 1987. Budget Furniture Rentals used a part of the Building for furniture storage and refurbishment from 1987 to 1991. Bakery Specialty Products occupied the remaining portion of the Building from 1988 to January 1994.
3. **Named Dischargers:** Wachovia Bank of North Carolina, N.A. (hereinafter the Discharger) is reportedly the trustee for the Wachovia Real Estate Fund and is named as

a discharger. The Wachovia Real Estate Fund is reportedly a common trust fund the corpus of which includes the property and is so named as a discharger. This Order shall be amended to include the owner of this property when such identity is known. Although previous tenants including South Bay CRT and Budget Furniture Rental would be considered dischargers by virtue of their business activities and chemical use on Site, Board staff is unable to locate these companies and they appear to be non-existent. Unauthorized releases of volatile organic chemicals impacting groundwater below the Site are believed to have occurred during their tenancy in mid to late 1980s.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the Site where it entered or could have entered waters of the State, the Board will consider adding those parties to this Order.

4. **Site Hydrogeology:** The Site is located on the bay plain, about two miles east of San Francisco Bay at an elevation of approximately 10 feet above mean sea level. Shallow unconfined groundwater exists beneath the Site at an average depth of seven feet below ground surface (bgs). The shallow sediments underlying the Site consist of silts and clays interbedded with sand lenses to a depth of about 20 feet. Sand layers occur at depths greater than 20 feet bgs. From about 20 to 70 feet bgs the geology is characterized by silts and clays interposed with sand layers 2 to 10 feet thick. Sand layers of 10 feet or more are present at a depth of less than 20 feet bgs south of the Site. Local groundwater flow is consistently toward the south-southeast to south direction.
5. **Remedial Investigation:** Elevated concentrations of Trichloroethylene (TCE) and other volatile organic chemicals are found in soil and groundwater below and in the vicinity of the Site. Several soil and groundwater investigations, including a soil gas survey, have been performed at the Site and the nearby properties since 1987. In 1987, Woodward Clyde Consultants conducted a soil and groundwater investigation for the neighboring downgradient property and found TCE concentration at 140,000 ppb in groundwater in a well (WC-2) located, next to the Site boundary, on the Utah Fund property. Despite the elevated level of TCE in groundwater, there was no TCE detected in shallow soil samples. In May 1988, consultants to the Discharger conducted a soil and groundwater investigation on Site and reported that 2,000 ppb of TCE was detected in a groundwater sample collected from a monitoring well located at the southwestern corner. Soil sample data from that boring indicate that total VOC concentrations decrease from 11,580 ppb at 1.5 feet bgs to 141 ppb at 10 feet bgs. No similar pollutants were detected in one upgradient and two crossgradient wells. Subsequent soil and groundwater investigations by various consultants for the Discharger and its immediate downgradient neighborhood provided abundant pollutant data.

To-date, about 52 soil borings have been drilled on and in the vicinity of the Site. One (1) intermediate zone and seventeen (17) shallow zone monitoring wells were converted from these borings for the purpose of groundwater pollution definition. The distribution of groundwater pollution follows the groundwater flow pattern, with the highest total

VOC concentrations at the southwestern corner of the Site and its vicinity. Volatile organic chemicals are also detected in the intermediate zone well. The groundwater TCE plume apparently has extended more than 700 feet from the source area and has dispersed to a lateral dimension of about 300 feet. Soil VOC concentrations decrease with depth in most of the borings on Site, but increase with depth in other off-site boring locations. **This indicates that groundwater pollution was generated from the Site near the southwestern corner.**

Hydraulic tests have been conducted on and off-Site by the Discharger to assess the subsurface hydrogeologic conditions below the Site. A well survey within a half-mile of the Site has been conducted by the Discharger and reported that no downgradient wells are currently used for water supply.

6. **Interim Remedial Measures:** Neither soil nor groundwater has been remedied. Interim remedial measures need to be implemented at this site to reduce the threat to water quality, public health, and the environment posed by the discharge of waste and to provide a technical basis for selecting and designing final remedial measures.
7. **Pollution Source:** Based on the above findings and Board staff's review of all the soil and groundwater data and on site tenancy, business practices, chemical use history, and property management practice, it is believed that the source of the chlorinated hydrocarbons detected in soil and groundwater at and in the vicinity of the Site originates from activities conducted by previous Site tenants.

a) Chemical Use History. A 1985 aerial photograph obtained from Pacific Aerial Surveys indicated the presence of 10 to 20 drums on the southwestern area of the Site. On-site storage of chlorinated hydrocarbons type "paint strippers" in 55-gallon drums was documented by photographs taken on December 9 and 10, 1987 (Budget Furniture Rental was one of the tenants at that time). These chlorinated hydrocarbon chemicals were stored in the garbage dumpster area near the southwestern corner outside the Building. The dumpster area is fenced and equipped with a locking device. Access to the inside of the dumpster area is deemed to be restricted. The storage area is apparently not intended for hazardous chemical storage as it is neither bermed nor sealed with chemically resistant liners. A review of local fire department records indicated that no permits were on file for operation of either a drum storage area or a hazardous materials storage area at the Site.

b) Subsurface Pollutant Data. Highest chlorinated hydrocarbons concentration in soil samples were found from a soil boring BW-6 close to the drum storage area on Site. Concentrations of chlorinated hydrocarbons in soil at this location (12 and 29 mg/kg of TCE and cis-1,2-Dichloroethylene, respectively) were higher by a factor of 10 than those detected in other soil sampling locations at surrounding properties. In addition the highest soil concentration of chlorinated hydrocarbons was found in the shallowest sample and decreased significantly with depth. Soil concentrations decrease radially from this soil

boring. This suggests that a surface or near-surface discharge of the chlorinated hydrocarbons has taken place on Site.

c) Poor Property Management. The lack of proper Site management by the Discharger has resulted in past illegal dumping and unauthorized discharge at the southwestern boundary of the Site. A site inspection by Board and local agency staff on October 1, 1992 found that:

- (i) rusty or stained tread marks left by 55-gallon drums were observed in the dumpster area;
- (ii) stressed vegetation was observed on Site in the unpaved area near the southwest boundary;
- (iii) extensive patching of asphalt pavement near the two storm drains on the southern and northern sides of the Building indicates that unauthorized surface discharge(s) of chemicals leading to the two storm drains had previously occurred on Site;
- (iv) the property main entrance is neither fenced nor guarded indicating outsiders can enter the Site without control; and
- (v) oily and chemically stained pavement surfaces and used motor oil filters were observed throughout the Site.

8. **Adjacent Sites:** The crossgradient PG&E property is a vacant field crossed by high-voltage power lines. Aerial photographs from Pacific Aerial Surveys indicated that no activity was taking place on this property. No chemical use has been documented on PG&E property.

Utah State Retirement Fund has owned the immediate downgradient property since 1984. Business activities conducted on this property included toy manufacturing, warehouse storage, office space, and education/training from 1976 to 1993. Small amounts of chemicals (mostly in 5-gallon containers) including polyester resin thinner, acetone, propanol, methanol, Freon TF, lubricants and cutting oils were reportedly used on site during that period. These chemicals are not the chlorinated hydrocarbons, which is mainly TCE and its degraded products, found in soils and groundwater at the boundary area between this property, the PG&E property and the Site.

Lusk Metals owns the property located adjacent to the Utah State Retirement Fund property, approximately 250 feet downgradient of the presumed source area. Business activities on this property include cutting and leveling of metal sheets. Oils and cutting fluids are used and stored for business operations at this site. Although TCE and cis-1,2-DCE are detected in groundwater below this property, neither compound has been reportedly used at this site.

The upgradient property, currently occupied by Alumtreat, has a history of major inorganic chemical spills. Previous tenants on this property reportedly operated metal

finishing activities involving wet-chemical processes using acids, bases, and metal solutions. Inorganic solutions containing metals were reportedly illegally dumped in the open field and in the facility in 1985 and 1986. These events of illegal discharge of chemical solutions led to the Alameda County District Attorney's actions against Anomet, the preceding tenant before Alumtreat. Despite these surface spills, the inorganic chemical nature of the chemicals in these spills is apparently different from that (volatile organic chemicals) found below the Site.

9. **Regulatory Status:** The Site is currently not subject to Board order.
10. **Basin Plan:** The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986, and the State Board approved it on May 21, 1987. The Board has amended the Basin Plan several times since then. The Basin Plan defines beneficial uses and water quality objectives for waters of the State, including surface waters and groundwaters.

The potential beneficial uses of groundwater underlying and adjacent to the site include:

- a. Municipal and domestic water supply
- b. Industrial process water supply
- c. Industrial service water supply
- d. Agricultural water supply

The potential beneficial uses of the Eden Creek and contiguous surface waters include:

- a. Contact and non-contact water recreation
- b. Wildlife habitat
- c. Warm fresh water habitat
- d. Fish migration and spawning

11. **Other Board Policies:** Board Resolution No. 88-160 strongly encourages dischargers of extracted, treated groundwater from site cleanups to reuse it or discharge it to the sanitary sewer.

Board Resolution No. 89-39, "Sources of Drinking Water," defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high TDS, low yield, or naturally-high contaminant levels.

12. **State Water Board Policies:** State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California", applies to this discharge and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Non-background cleanup levels must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses

of such water, and not result in exceedance of applicable water quality objectives.

State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304", applies to this discharge. This order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

13. **Basis for 13304 Order:** The Discharger has caused or permitted waste to be discharged or deposited where it is or probably will be discharged into waters of the State and creates or threatens to create a condition of pollution or nuisance.
14. **Cost Recovery:** Pursuant to California Water Code Section 13304, the Discharger is hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order.
15. **CEQA:** This action is an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
16. **Notification:** The Board has notified the Discharger and all interested agencies and persons of its intent under California Water Code Section 13304 to prescribe site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.
17. **Public Hearing:** The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the Discharger (or its agents, successors, or assigns) shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous substances in a manner which will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.
2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of wastes or hazardous substances are prohibited.

B. TASKS

1. The Discharger shall perform all investigation and cleanup work in accordance with the requirements of this Order. All technical reports submitted in compliance with this Order shall be satisfactory to the Executive Officer, and, if necessary, the Discharger may be required to submit additional information.
2. To comply with all of the Prohibitions, Provisions and Tasks of this Order and the Self-Monitoring Program, the Discharger shall meet the following compliance task and time schedules:

- a. **POTENTIAL CONDUITS EVALUATION WORKPLAN**

COMPLIANCE DATE: August 31, 1995

Submit a workplan acceptable to the Executive Officer to evaluate all potential conduits in the vicinity of the site. The Discharger shall propose the scope and extent of this evaluation based on the results of its previous wells survey, its interpretation of the hydrogeologic conditions, and the information of all subsurface utility pipelines within the soil and groundwater contamination area. Any potential conduit existing in the pollution area (or in the immediate downgradient location) which would allow pollutants to migrate from the ground surface to groundwater, and/or between water bearing zones should be identified. These include but are not limited to existing monitoring and extraction wells and historical extraction or drainage wells. The work plan shall also include the proposed closure activity for any potential conduits and its implementation schedule.

- b. **INTERIM REMEDIAL ACTION WORKPLAN**

COMPLIANCE DATE: September 30, 1995

Submit a workplan acceptable to the Executive Officer to evaluate interim remedial action alternatives for soil and groundwater and to recommend one or more alternatives for implementation. The workplan should specify a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently. If groundwater extraction is selected as an interim remedial action, then one task will be finding an acceptable method of disposal for the extracted groundwater.

c. **POTENTIAL CONDUITS CLOSURE**

COMPLIANCE DATE: November 16, 1995

Submit a technical report acceptable to the Executive Officer documenting the closure of any potential conduits as identified in Task B.2.a. The report should include documentation of the appropriate permits, types and quantities of materials used to seal each well, and/or the method of well destruction, as well as a description/location of the water bearing zones which were sealed.

d. **COMPLETION OF INTERIM REMEDIAL ACTIONS**

COMPLIANCE DATE: February 28, 1996

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task B.2.b. workplan. For ongoing actions, such as soil vapor extraction or groundwater extraction, the report should document start-up as opposed to completion. Should the approved interim remedial method consist of separate cleanup efforts, such as on-site soil, on-site groundwater, and off-site groundwater remediation, each part should have a workplan followed by a technical report. The final report for the last part of the approved interim remedial method identified shall meet this completion date.

e. **PROPOSED FINAL REMEDIAL ACTIONS AND CLEANUP STANDARDS**

COMPLIANCE DATE: August 31, 1996

Submit a technical report acceptable to the Executive Officer containing:

- (1) Results of the remedial investigation;
- (2) A 90-day evaluation of the interim remedial actions;
- (3) Feasibility study evaluating alternative final remedial actions;
- (4) Risk assessment for current and post-cleanup exposures;
- (5) Recommended final remedial actions and cleanup standards; and
- (6) Implementation tasks and time schedule.

Item (2) should include an assessment of the implemented interim remedial actions for both soils and groundwater. If the extraction and treatment technology is used for groundwater remediation, the report should include an evaluation of the performance of system in terms of its hydraulic containment and groundwater cleanup efficiency and effectiveness. In particular, the report should evaluate the following in details:

-hydraulic influence and capture zone analysis;

- optimum groundwater extraction and chemicals removal rates;
- fate and transport of contaminants;
- system operation mode and problems encountered during that period; and
- suggested methods to improve remediation performance.

Item (3) should include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Items (1) and (3) should be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), CERCLA guidance documents with respect to remedial investigations and feasibility studies, Health and Safety Code Section 25356.1(c), and State Board Resolution No. 92-49, as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304"). Upon acceptance of this technical report, the Board will revise this Order to include the proposed final actions, soil and groundwater cleanup goals, and implementation schedule.

3. **Delayed Compliance:** If the Discharger is delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the Discharger shall promptly notify the Executive Officer and the Board may consider revision to this Order.

C. PROVISIONS

1. **No Nuisance:** The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in California Water Code Section 13050(m).
2. **Good O&M:** The Discharger shall maintain in good working order and operate as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this Order.
3. **Cost Recovery:** The Discharger shall be liable, pursuant to California Water Code Section 13304, to the Board for all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the Discharger over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.

4. **Access to Site and Records:** In accordance with California Water Code Section 13267(c), the Discharger shall permit the Board or its authorized representative:
 - a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
 - b. Access to copy any records required to be kept under the requirements of this Order.
 - c. Inspection of any monitoring or remediation facilities installed in response to this Order.
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the Discharger.
5. **Self-Monitoring Program:** The Discharger shall comply with the Self-Monitoring Program as attached to this Order and as may be amended by the Executive Officer.
6. **Contractor/ Consultant Qualifications:** All technical documents shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.
7. **Lab Qualifications:** All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).
8. **Document Distribution:** Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:
 - a. City of Hayward, Fire Department
 - b. Department of Toxic Substance Control, CAL/EPA
 - c. Alameda County Environmental Health Department
9. **Reporting of Changed Owner or Operator:** The Discharger shall file a report on any changes in site occupancy or ownership associated with the property described in this Order.

10. **Reporting of Hazardous Substance Release:** If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the Discharger shall report such discharge to the Regional Board by calling (510) 286-1255 during regular office hours (Monday through Friday, 8:00 to 5:00).

A written report shall be filed with the Board within five (5) working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/ agencies notified.

This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

11. **Periodic SCR Review:** The Board will review this Order periodically and may revise it when necessary. The Discharger may request revisions and upon review, the Executive Officer may recommend that the Board revise these requirements.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on June 21, 1995.



Steven R. Ritchie
Executive Officer

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FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13267 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

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Attachments: Site Map
 Self-Monitoring Program

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM FOR:

WACHOVIA REAL ESTATE FUND, AND
WACHOVIA BANK OF NORTH CAROLINA, N.A.
301 NORTH MAIN STREET
WINSTON-SALEM, NC 27150-3099

WACHOVIA REAL ESTATE FUND PROPERTY located at
26545-63 CORPORATE AVENUE
HAYWARD
ALAMEDA COUNTY

1. **Authority and Purpose:** The Board requests the technical reports required in this Self-Monitoring Program pursuant to Water Code Sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Board Order No. 95-141.
2. **Monitoring:** The Discharger shall measure groundwater elevations in each well monthly for the first three months and quarterly thereafter, and shall collect and analyze representative samples of groundwater according to the schedule shown in Appendix I of this self-monitoring program.

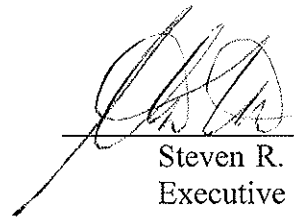
The Discharger shall sample any new monitoring or extraction wells quarterly and analyze groundwater samples for the same constituents as shown in the above table. After a minimum of two years of quarterly monitoring, the Discharger may propose changes in the above table; any proposed changes are subject to Executive Officer approval.

3. **Quarterly Monitoring Reports:** The Discharger shall submit quarterly monitoring reports to the Board no later than 30 days following the end of the quarter (e.g. first quarter report due April 30). The first quarterly monitoring report shall be due on July 31, 1995. The reports shall include:
 - a. **Transmittal Letter:** The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the Discharger's principal executive officer or his/her duly authorized representative, and shall include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.
 - b. **Groundwater Elevations:** Groundwater elevation data shall be presented in tabular

- form, and a groundwater elevation map should be prepared for each monitored water-bearing zone. Well data including, but not being limited to the well depths, screen intervals, well elevations, shall also be presented in tabular form. Historical groundwater elevations shall be included in the fourth quarterly report each year.
- c. **Groundwater Analyses:** Groundwater sampling data shall be presented in tabular form, and an iso-concentration map should be prepared for one or more key contaminants for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method used and detection limits obtained for each reported constituent. Historical groundwater sampling results shall be included in the fourth quarterly report each year. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases. Supporting data, such as laboratory data sheets, need not be included (however, see record keeping - below). QA/QC summary data shall be included in the report.
 - d. **Groundwater Extraction:** If applicable, the report shall include groundwater extraction results in tabular form, for each extraction well and for the site as a whole, expressed in gallons per minute and total groundwater volume for the quarter. The report shall also include contaminant removal results, from groundwater extraction wells and from other remediation systems (e.g. soil vapor extraction), expressed in units of chemical mass per day and mass for the quarter. Historical mass removal results shall be included in the fourth quarterly report each year.
 - e. **Status Report:** The quarterly report shall describe relevant work completed during the reporting period (e.g. site investigation, interim remedial measures) and work planned for the following quarter.
- 4. **Violation Reports:** If the Discharger violates requirements in the Site Cleanup Requirements, then the Discharger shall notify the Board office by telephone as soon as practicable once the Discharger has knowledge of the violation. Board staff may, depending on violation severity, require the Discharger to submit a separate technical report on the violation within five (5) working days of telephone notification.
 - 5. **Other Reports:** The Discharger shall notify the Board prior to any site activities, such as construction or underground tank removal, which have the potential to cause further migration of contaminants or which would provide new opportunities for site investigation.
 - 6. **Record Keeping:** The Discharger or his/her agent shall retain data generated for the above reports, including lab results and QA/QC data, for a minimum of six years after origination.

7. **SMP Revisions:** Revisions to the Self-Monitoring Program may be ordered by the Executive Officer, either on his/her own initiative or at the request of the Discharger. Prior to making SMP revisions, the Executive Officer will consider the burden, including costs, of associated self-monitoring reports relative to the benefits to be obtained from these reports.

I, Steven R. Ritchie, Executive officer, hereby certify that this Self-Monitoring Program was adopted by the Board on June 21, 1995.



Steven R. Ritchie
Executive Officer

Attachment: Appendix I

APPENDIX I

Self-Monitoring Schedule for Wachovia Real Estate Fund Property Site

Well #	Sampling Frequency	Analyses	Well #	Sampling Frequency	Analyses
MW-1	S/A	8010	MW-10	Q	8010
MW-2	Q	8010	MW-11	Q	8010
MW-3	Q	8010	MW-12	Q	8010
MW-4	S/A	8010	MW-13	Q	8010
MW-5	Q	8010	WC-1	Q	8010
MW-6	Q	8010	WC-2	Q	8010
MW-7	S/A	8010	WC-3	Q	8010
MW-8	Q	8010	WC-4	Q	8010
MW-9	Q	8010	WC-5	Q	8010

Key: Q = Quarterly 8010 = EPA Method 8010 or equivalent
S/A = Semi-Annually